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MEMORANDUM

DATE: February 20, 1987

TO: John Osborn, FIT-RPO, USEPA, Region X

FOR: Lori Cohen, USEPA, Region X

THRU: ^RDavid Buecker, FIT-OM, E&E, Seattle TAT

FROM: Andrew Hafferty, Senior Chemist, E&E, Seattle ggt

SUBJ: Drum Disposal
Resource Recovery
Pasco, Washington

REF: TDD F10-8611-03

CC: Thomas Tobin, E&E (Seattle)
Jeff Villnow, E&E, Seattle

Investigation derived soil drill cutting wastes were contained in drums during the July and August, 1985 Site Investigation at Resource Recovery in Pasco, Washington. In response to an EPA request, E&E has determined the potential that these soils could fail EP Toxicity testing.

With the exception of one sample, EE3 (10-30'), it is theoretically impossible for soil in drums at the Resource Recovery site to fail EP Toxicity testing, based on analytical data received under the EPA CLP program. EP Toxicity criteria for lead is 5.0 mg/l. If 100% leaching of lead present in soil associated with EE3 (10-30') were to occur, the resultant EP Toxicity would be less than or equal to 5.0 mg/l. No realistic probability of complete dissolution of this lead under environmental conditions can be foreseen.

AH:ilt